



<p>Attorney or Party Name, Address, Telephone &amp; FAX Nos., State Bar No. &amp; Email Address</p> <p>SIMON ARON (State Bar No. 108183) saron@wrslawyers.com JOHNNY WHITE (State Bar No. 269306) jwhite@wrslawyers.com WOLF, RIFKIN, SHAPIRO, SCHULMAN &amp; RABKIN, LLP 11400 West Olympic Boulevard, 9th Floor Los Angeles, California 90064-1582 Telephone: (310) 478-4100 Facsimile: (310) 479-1422</p> <p><input type="checkbox"/> Individual appearing without attorney <input checked="" type="checkbox"/> Attorney for: DEBT RELIEF GROUP, LLC</p>	<p>FOR COURT USE ONLY</p>
<p style="text-align: center;"><b>UNITED STATES BANKRUPTCY COURT</b> <b>CENTRAL DISTRICT OF CALIFORNIA - SANTA ANA DIVISION</b></p> <p style="text-align: right;"></p>	
<p>In re:</p> <p>THE LITIGATION PRACTICE GROUP, P.C.</p> <p style="text-align: right;">Debtor(s).</p>	<p>CASE NO.: 8:23-bk-10571-SC CHAPTER: 11 </p>
	<p style="text-align: center;"><b>MOTION FOR PROTECTIVE ORDER PURSUANT TO 11 U.S.C. § 107(c) AND FRBP 9037 TO RESTRICT ACCESS TO FILED DOCUMENTS CONTAINING PERSONAL DATA IDENTIFIERS</b></p> <p style="text-align: center;">[No Hearing Required]</p>

Movant DEBT RELIEF GROUP, LLC hereby moves this court, pursuant to 11 U.S.C. § 107(c) and FRBP 9037 for a protective order to restrict public access to filed documents containing personal data identifiers for an individual (including but not limited to, an individual's social security number or tax identification number, financial account numbers, birth dates and/or names of minor children). See also LBR 1002-1(e). Movant further moves that the court authorize the redaction of personal data identifiers from these documents and direct the clerk of the court to restrict public access to these documents as originally filed, whether electronically or manually, so that the personal data identifiers are not available to public access.

Movant hereby certifies that the documents on the attached list containing personal data identifiers were filed on the dates stated below and that public disclosure of personal data identifiers would create undue risk of identity theft or other unlawful injury to the individual or his/her property. (List each document separately and provide the date(s) of filing of the document and its assigned docket entry or claim number(s). You may attach as many continuation pages as necessary.)

I declare under penalty of perjury that the foregoing is true and correct.

_____	_____	_____
Date	Printed name of Movant	Signature of Movant
 07/12/2023	 Johnny White	 / s / Johnny White
Date	Printed name of attorney	Signature of attorney for Movant

**ATTACHMENT TO MOTION FOR PROTECTIVE ORDER PURSUANT TO  
11 U.S.C. § 107(c) AND FRBP 9037 TO RESTRICT ACCESS TO FILED DOCUMENTS  
CONTAINING PERSONAL DATA IDENTIFIERS**

LIST OF DOCUMENTS IDENTIFIED IN MOTION TO BE REDACTED AND PUBLIC ACCESS TO BE RESTRICTED.

[illegible]

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:  
11400 West Olympic Boulevard, 9th Floor, Los Angeles, California 90064

A true and correct copy of the foregoing document entitled: **MOTION FOR PROTECTIVE ORDER PURSUANT TO 11 U.S.C. § 107(c) AND FRBP 9037 TO RESTRICT ACCESS TO FILED DOCUMENTS CONTAINING PERSONAL DATA IDENTIFIERS** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF)**: Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) \_\_\_\_\_, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☐ Service information continued on attached page

2. **SERVED BY UNITED STATES MAIL**:

On (date) 07/12/2023, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

3. **SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) 07/12/2023, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

**Served via Personal Delivery:**

United States Bankruptcy Court  
Honorable Scott Clarkson  
Central District of California  
411 West Fourth Street, Suite 5130  
Santa Ana, California 92701

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

07/12/2023     Jean Lee  
Date                      Printed Name

/s/ Jean Lee  
Signature

**SERVED BY U.S. MAIL:**

Creditor Committee:

**Committee of Unsecured Creditors**

c/o Fox Rothschild LLP

Attn: Nicholas A. Koffroth & Keith C. Owens

10250 Constellation Blvd.

Suite 900

Los Angeles, CA 90067

U.S. Trustee:

**United States Trustee (SA)**

**Attention: Kenneth Miskin**

DOJ-Ust

Office of the United States Trustee

411 W Fourth St., Suite 7160

Santa Ana, CA 92701-4593

Chapter 11 Trustee:

**Richard A Marshack (TR)**

Marshack Hays LLP

870 Roosevelt

Irvine, CA 92620

Attorneys for Chapter 11 Trustee:

**Christopher Celentino**

Dinsmore & Shohl LLP

655 W. Broadway

Suite 800

San Diego, CA 92101

Debtor:

**The Litigation Practice Group P.C.**

17542 17th St

Suite 100

Tustin, CA 92780

Counsel for Debtor:

**Joon M Khang**

KHANG & KHANG LLP

4000 Barranca Parkway, Suite 250

Irvine, CA 92604